

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

ABU BAKR LADD,	:	
Plaintiff	:	
	:	
v.	:	4:05-CV-0916 RHK/AJB
	:	
	:	
JEFFREY PICKERING, Detective,	:	
Defendant	:	

**ABU BAKR LADD’S MOTION FOR AN AWARD
OF REASONABLE ATTORNEY’S FEES, LITIGATION COSTS,
EXPENSES AND INTEREST**

NOW COMES, Plaintiff, Abu Bakr Ladd (“Mr. Ladd”) by and through his counsel, Anser Ahmad, Esquire, hereby submits this Motion For Attorney’s Fees Pursuant to Federal Rules of Civil Procedure, Rule 54(d)(1) and (2), Local Rules of Court 8.02 and 8.03, 42 U.S.C. §§ 1983 and 1988 *et seq.*, Litigation Costs and Expenses Pursuant to 28 U.S.C. §§ 1920 *et seq.* and Interest Pursuant to 28 U.S.C. §§ 1961 *et seq.* and demands reasonable attorney’s fees in the amount of \$371,295.83, plus reasonable costs and expenses in the amount of \$3,540.00 (not including the Bill of Costs submitted separately at Doc. 223 in the amount of \$6,966.06).

This figure includes reasonable attorney’s fees in the amount of \$27,228.75 for his successful appeal to the United States Court of Appeals for the Eighth

Circuit and reasonable attorney's fees in the amount of \$22,004.17 for the preparation of this fee petition.

Finally, pursuant to 28 U.S.C. §§ 1961 et seq., Mr. Ladd demands post-judgment interest at a rate of 3.30% per day until the fees and costs are paid in full.

Respectfully submitted,

/s/ Anser Ahmad

Anser Ahmad, Esq.
PA I.D. No. 75008 (admitted *pro hac vice*)
Ahmad Law Offices, P.C.
114 Walnut St., Ste. 4
Harrisburg, PA 17101
(717) 920-9100
Attorney for Plaintiff

Dated: December 30, 2010

CERTIFICATE OF SERVICE

I, hereby certify that I have, on December 30, 2010, filed the foregoing *Plaintiff's Motion* along with any attached pages electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon:

Dana C. Ceresia, Esq.
Missouri Attorney General's Office
Post Office Box 861
St. Louis, MO 63188

Respectfully submitted,

/s/ Anser Ahmad

Anser Ahmad, Esq.
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Attorney for Plaintiff

Dated: December 30, 2010